

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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**Attorneys for the Debtor**

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In re:	:	Case No.: 14-20608 (JNP)
	:	
KONSTANTINOS TZITZIFAS ,	:	Chapter 11
	:	
Debtor	:	
	:	
	x	

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**NOTICE OF MOTION FOR ENTRY OF DISCHARGE**

PLEASE TAKE NOTICE, that on March 8, 2016, at 10:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorneys for the Debtor will move before the Honorable Jerrold N. Poslusny, Jr., United States Bankruptcy Judge, 401 Market Street, Camden, New Jersey, for an order discharging the Debtor from his debts. The grounds for the within motion are as set forth more fully in the Certification annexed hereto and served and filed together herewith.

PLEASE TAKE FURTHER NOTICE, that the within motion shall be deemed uncontested and the proposed form of order signed in the discretion of the court, unless a response is timely filed and/or presented within the time set forth in the Federal Rules of Bankruptcy Procedure, stating with particularity the basis of the opposition to the relief sought.

**CERTIFICATION**

The undersigned certifies that no novel issues of law or fact are presented on this motion to necessitate or require the preparation and filing of a brief on this motion.

DATED: February 7, 2016

McDOWELL POSTERNOCK APELL & DETRICK, PC  
Attorneys for Debtor

By: /s Ellen M. McDowell  
Ellen M. McDowell